

III. REMARKS

Claims 1, 4-5, 7-9, 11 14-15 and 17-22 are pending in this application. By this Amendment, claims 1, 4-5, 7, 9, 11 and 14-15 have been amended, while claims 3, 6, 13 and 16 have been cancelled. Claims 17-22 have been added. Support for these amendments and new claims may be found in Applicant's original Specification, for example, at pages 5-7 and FIGS. 1-2. Applicant is not conceding in this application that those claims are not patentable over art cited by the Examiner, as the present claim amendments and cancellations are for facilitating expeditious allowance of the claimed subject matter. Further, Applicant reserves the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claims 3 and 13 are objected to as being dependant upon cancelled claims 2 and 12, respectively. Claims 1-4 and 6-10 are rejected under 35 USC 103(a) as being allegedly being unpatentable over Sasmazel et al., US 6,725,376 ("Sasmazel") in view of Leveridge et al., US 7,233,997 ("Leveridge"). Claims 11-14 and 16 are rejected under 35 USC 103(a) as being allegedly being unpatentable over Sasmazel in view of Leveridge, and in further view of Clark et al. US 6,442,588 ("Clark"). Claim 5 is rejected under 35 USC 103(a) as allegedly being unpatentable over Sasmazel in view of Leveridge, and in further view of Muratov et al., US Publication No. 2003/0097596 ("Muratov"). Claim 15 is rejected under 35 USC 103(a) as allegedly being unpatentable over Sasmazel in view of Leveridge, in further view of Clark, and in further view of Muratov. Applicant respectfully submits that the claims are in condition for allowance.

With respect to claim objections, Applicant has cancelled claims 3 and 13, and as such, the objections are moot. Accordingly, Applicant respectfully requests withdrawal of the objections.

With respect to rejections under 35 U.S.C. 103(a), Applicant respectfully submits that neither Sazmazel nor Leveridge teach or suggest each and every feature of claim 1. For example, Sazmazel fails to teach or suggest, among other things, "...the physical security system includes a proxy server module for comparing only a portion of an IP address obtained from a received message against only a like portion of the reference IP address for the logged in user." (Claim 1). At best, Sazmazel describes a "web script", which "checks [an] eticket is authentic or invalid." (Sazmazel at col. 9, lines 12-15; *See*, Office Action at page 4, "[a]s per claim 6..."). While Sazmazel's eticket may include IP address information from either of a client device ("Client IP address") or an authentication server ("Authentication Server IP Address"), its method does not teach or suggest, among other things, "comparing only a portion of an IP address...against only a like portion of the reference IP address." (Claim 1). Further, Leveridge fails to disclose, among other things, the above-referenced features of claim 1. Accordingly, Applicant respectfully requests withdrawal of the rejection of claim 1 under 35 U.S.C. 103(a). Further, Applicant respectfully reiterates arguments made in the Appeal Brief of 9 February 2009. Specifically, Applicant directs the Office's attention to the portion of claim 1 which reads, "...a physical security system for processing Internet protocol (IP) address information of the client device at the Internet server..." (Claim 1). As is evident, claim 1 is drawn to a system comprising a physical security system located at the Internet server. In contrast, Sasmazel discloses a separate authentication server which creates an "eticket" and passes it to other servers for later access by users. (*Id.*). In isolating the authentication server, Sasmazel necessarily fails

to disclose, *inter alia*, a “physical security system ...at the Internet server...,” and further fails to disclose “...a proxy server module...” included in the physical security system at the Internet server. (Claim 1). As such, Applicant submits that Sazmazel fails to teach or suggest all of the features of claim 1. Further, Leveridge fails to disclose, among other things, the above-referenced features of claim 1. Accordingly, Applicant respectfully requests withdrawal of the rejection of claim 1 under 35 U.S.C. 103(a).

With respect to claim 7, Applicant submits that the proposed combination of Sazmazel and Leveridge fails to teach or suggest “[a] method of authenticating a user accessing an Internet server...” that includes all the features claimed therein. For example, for reasons stated in the discussion of the proposed combination of Sazmazel and Leveridge above, Applicant submits that the proposed combination of Sazmazel and Leveridge fails to teach or suggest the method of claim 7, including “...the determining of the IP address including examining only a portion of the IP address of the requesting user and determining if the portion matches only a like portion of the reference IP address.” As a result, Applicant respectfully requests withdrawal of the rejections of claim 7 as allegedly being unpatentable over Sazmazel and Leveridge.

With respect to claim 11, Applicant submits that the proposed combination of Sazmazel and Leveridge fails to teach or suggest “[a] program product... for providing security for an Internet server...” that includes all the features claimed therein. For example, for reasons stated in the discussion of the proposed combination of Sazmazel and Leveridge above, Applicant submits that the proposed combination of Sazmazel and Leveridge fails to teach or suggest the program product of claim 11, including “...the component for processing IP address information includes a proxy server module for comparing only a portion of an IP address obtained from a received message against only a like portion of the reference IP address for the logged in user.”

As a result, Applicant respectfully requests withdrawal of the rejections of claim 11 as allegedly being unpatentable over Sasmazel and Leveridge.

Neither Clark nor Muratov overcome the deficiencies of Sasmazel and Leveridge, discussed above. As such, Applicant respectfully requests withdrawal of rejections based upon any and all combinations of Clark, Muratov, Leveridge and Sasmazel.

The dependent claims are believed allowable for the same reasons stated above, as well as for their own additional features.

Applicant submits that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicant does not acquiesce to the Examiner's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. Additionally, Applicant does not acquiesce to the Examiner's analysis, combinations, and modifications of the various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Examiner's combinations and modifications have not been separately addressed herein for brevity. However, Applicant reserves the right to present such arguments in a later response should one be necessary.

Should the Examiner believe that anything further is necessary in order to place the application in better condition for allowance, the Examiner is requested to contact Applicant's undersigned representative at the telephone number listed below.

Respectfully submitted,

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